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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES,
INC., PASSENGER SEXUAL
ASSAULT LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**STIPULATION AND [PROPOSED] ORDER
REGARDING BRIEFING SCHEDULE FOR
MOTION FOR PROTECTIVE ORDER OR
TO QUASH**

This Document Relates to:

All Matters

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

1 This Stipulation is entered by and among Plaintiffs and Defendants Uber Technologies,
2 Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” and together with Plaintiffs, the
3 “Parties”) through their respective undersigned counsel of record.

4 **WHEREAS**, Plaintiffs have notified Uber of their intent to depose Dara Khosrowshahi,
5 Travis Kalanick, Jill Hazelbaker, Sachin Kansal, Frank Chang, Michael Akamine, Sarfraz Maredia,
6 Rachel Whetstone, Mat Henley, Joseph Sullivan, and Ryan Graves (collectively the “Potential
7 Witnesses”);

8 **WHEREAS**, Uber intends to file a motion for protective order and/or to quash in
9 connection with the depositions of the Potential Witnesses;

10 **WHEREAS**, Mat Henley, Joseph Sullivan, and Ryan Graves is each represented by
11 independent counsel;

12 **WHEREAS**, this Court’s January 14, 2025, Order Regarding Joint Letter Addressing
13 Scheduling Depositions (ECF No. 2085) provided that “if Uber intends to seek a protective order,
14 the joint discovery letter seeking such relief concerning [Frank Chang, Ryan Graves, Mat Henley,
15 and Sachin Kansal] shall be filed no later than three weeks in advance of the deposition date,” and
16 such an order would presumably apply to similar motions brought by Uber;

17 **WHEREAS**, the Parties agree that the most efficient manner to resolve their dispute with
18 respect to the depositions of the Potential Witnesses is to address the dispute in a consolidated
19 motion (the “Motion”) filed and briefed pursuant to a stipulated briefing schedule;

20 **WHEREAS**, the following stipulated schedule would have the Motion fully briefed no later
21 than three weeks in advance of the currently-scheduled placeholder dates for the Potential
22 Witnesses;

23 **WHEREAS**, independent counsel for Uber has conferred with independent counsel for
24 Ryan Graves, who has indicated their intent to either (i) abide by the briefing schedule presented
25 in this stipulation with respect to any independent motion, or supplemental briefing, that may be
26 submitted by Ryan Graves in connection with the Motion, or (ii) proceed with a separate request
27 for relief consistent with the procedures set out under Pretrial Order No. 8 and this Court’s January
28 14, 2025, Order Regarding Joint Letter Addressing Scheduling Depositions (ECF No. 2085);

1 **WHEREAS**, independent counsel for Mat Henley and Joseph Sullivan have not joined this
2 stipulation and each reserves all of his rights to bring an application for relief at an appropriate
3 time, consistent with the Federal Rules of Civil Procedure and this Court's rules and applicable
4 orders, and Plaintiffs reserve all rights to oppose such application(s).

5 **IT IS HEREBY STIPULATED and AGREED** by and between the Parties that:

6 1. Uber shall file the Motion, limited to 25 pages, and supporting declarations on
7 February 28, 2025;

8 2. Plaintiffs shall file and serve their opposition to Uber's Motion, limited to 25 pages,
9 on March 21, 2025;

10 3. Uber shall file and serve its reply in support of the Motion, limited to 15 pages, on
11 March 28, 2025; and

12 4. Any supplemental briefing filed by Ryan Graves in connection with the Motion will
13 be filed in accordance with the foregoing schedule, and shall be limited to four (4) double spaced
14 pages per Third Party witness .

15 5. Ryan Graves reserves the right to make a separate request for relief via joint
16 discovery letter that shall be filed no later than three weeks in advance of the deposition date for
17 Mr. Graves; provided, however, that if Mr. Graves submits supplemental briefing in connection
18 with Uber's Motion, Mr. Graves shall not pursue a separate joint discovery letter.

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Inc., Rasier, LLC, and Rasier-CA, LLC*

FILER'S ATTESTATION

I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: February 27, 2025

By: /s/ Randall S. Luskey
Randall S. Luskey

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PURSUANT TO STIPULATION, IT SO ORDERED:

The Stipulation Regarding Briefing Schedule for Motion for Protective Order or to Quash
is **GRANTED**.

IT IS SO ORDERED.

Dated: _____

LISA J. CISNEROS
United States Magistrate Judge